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# Before the COPYRIGHT ROYALTY JUDGES Washington, D.C.

In the Matter of	)	
Distribution of 2004, 2005, 2006, 2007,	•	Docket No. 2012-6 CRB CD <u>2004</u> -2009
2008 and 2009 Cable Royalty Funds	) (	(Phase II) SEP 1 / 2016
In the Matter of	)	Copy light Reventer Boure
Distribution of 1999-2009 Satellite Royalty Funds	,	Docket No. 2012-7 CRB SD 1999-2009 (Phase II)

#### INDEPENDENT PRODUCERS GROUP'S RESPONSE TO ORDER TO SHOW CAUSE

On September 6, 2016, the Judges issued an order observing that on August 26, 2016, the Settling Devotional Claimants ("SDC") had filed a "Notice of Consent to 1999-2009 Satellite Shares Proposed by Independent Producers Group, and Motion for Entry of Distribution Order" ("Notice and Motion for Distribution"), and asking any party taking issue with such motion to show cause why such motion should not be granted.

Although it may be obvious from the various filings in this matter over the last two weeks by Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG"), and the SDC and Motion Picture Association of America ("MPAA"), IPG wishes to make it clear that IPG does not agree with the SDC's motion because the figures in IPG's Direct Statement were found to be incorrectly calculated and set forth, resulting in IPG filing an Amended Direct Statement on August 31, 2016.

Thereafter, on September 2, 2016, IPG filed an Opposition to the SDC's August 26, 2016

Notice and Motion for Distribution, in which IPG set forth why such motion should be denied.

Rather than repeat that Opposition, IPG simply references it, and incorporates it herein by reference, in response to the Judges September 6, 2016 Order to Show Cause.

Additionally, note that on September 2, 2016, the MPAA filed a Motion to Strike IPG's Amended Statement; on September 12, 2016, IPG filed an Opposition to that MPAA motion; on September 9, the SDC filed a Reply and Motion for Distribution to IPG's Opposition to the SDC's August 26, 2016 Notice and Motion for Distribution; and by September 16, 2016, IPG will file an opposition to that.

All these filings address the issue raised by the Judges September 6, 2016 Order, and given the number of such filings, have left nothing uncovered, presumably obviating the need for yet another brief on the subject.

Respectfully submitted,

Dated: September 14, 2016

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Attorneys for Independent Producers Group

# CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September, 2016, a copy of the foregoing was sent by electronic mail to the parties listed on the attached Service List.

/s/	
Brian D. Boydston	

## MPAA REPRESENTED PROGRAM SUPPLIERS

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## **SETTLING DEVOTIONAL CLAIMANTS:**

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